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Attorneys for Robert Michael Mondavi, Jr.,
individually and as *guardian ad litem* for RMM
and RARM; and Lydia Abernathy Mondavi

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re) Case No. 19-30088 (DM)
PG&E CORPORATION,)
and) Chapter 11
) (Lead Case—Jointly Administered)
PACIFIC GAS AND ELECTRIC)
COMPANY) **Amended Notice of Motion to Amend Proof of**
Debtors) **Claim No. 91790 Filed by Robert Michael**
) **Mondavi, or Alternatively, for the Allowance**
) **of a Late-Filed Claim**

Affects:)
) Date: March 24, 2021
 ☐ PG&E Corporation) Time: 10:00 a.m. (Pacific)
 ☐ Pacific Gas & Electric Company) Place: Telephonic/Video Appearance Only
 ☒ Both Debtors) United States Bankruptcy
) Courtroom 17,
) 450 Golden Gate Ave., 16th Floor
 * All papers shall be filed in the Lead Case,) San Francisco, CA 94102
 No. 19-30088 (DM).)
)
) Objection Deadline: March 17, 2021

1 **PLEASE TAKE NOTICE** that on February 18, 2021, as Dk. No. 10229, Robert Michael
2 Mondavi, Jr., individually and as *guardian ad litem* for RMM and RARM; and Lydia Abernathy
3 Mondavi (collectively, “Movants”) filed a motion to amend Proof of Claim No. 91790 (“Claim”) or,
4 alternatively, for the allowance of a late-filed claim arising from damage caused by the 2017 North
5 Bay Fire (“Motion”). In connection with the Motion, Movants also filed a declaration, notice of
6 motion, and certificate of service, Dkt. Nos. 10230-10232 (collection with the Motion, “Motion
7 Papers”).

8 **PLEASE TAKE FURTHER NOTICE** that the Motion Papers incorrectly state that the
9 Court will hold a hearing on the Motion on March 9, 2021. **In actuality, the Court will hold a**
10 **hearing on the Motion on March 24, 2021, at 10:00 a.m. (Pacific Time)** in the Courtroom of the
11 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden
12 Gate Avenue, San Francisco, CA 91402.

13 **PLEASE TAKE FURTHER NOTICE** that all interested parties should consult the
14 Bankruptcy Court’s website at www.canb.uscourts.gov for information about court operations during
15 the COVID-19 pandemic. The Bankruptcy Court’s website provides information regarding how to
16 arrange a telephonic or video appearance. If you have any questions regarding how to appear at a
17 court hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live
18 Chat feature on the Bankruptcy Court’s website.

19 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must
20 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Movants at the
21 above-referenced addresses so as to be received by the time set by the Bankruptcy Court. Any
22 oppositions or responses must also be filed and served on all “Standard Parties” as defined in, and in
23 accordance with, the Second Amended Order Implementing Certain Notice and Case Management
24 Procedures entered on May 14, 2019 (EFC No. 1996) (“Case Management Order”). Any relief
25 requested in the Motion may be granted without a hearing if no opposition is timely filed and served
26 in accordance with the Case Management Order. In deciding the Motion, the Court may consider any
27 other document filed in these Chapter 11 Cases and related adversary proceedings.

28 **PLEASE TAKE FURTHER NOTICE THAT** that copies of the Motion and its supporting

1 papers can be viewed and/or obtained: (i) by accessing the Court's website at
2 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
3 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime
4 Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
5 U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:
6 pgeinfo@primeclerk.com.

7 Note that a PACER password is needed to access documents on the Bankruptcy Court's
8 website.

9 Respectfully submitted,

10 Dated: February 22, 2021

GRIMSHAW LAW GROUP, P.C.



12 By: _____
13 MATTHEW W. GRIMSHAW

14 Dated: February 22, 2021

ROBINS CLOUD LLP



16 By: _____
17 KEVIN M. POLLACK

18 Attorneys for Robert Michael Mondavi, Jr.,
19 individually and as *guardian ad litem* for RMM and
20 RARM; and Lydia Abernathy Mondavi
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1 **CERTIFICATE OF SERVICE**

2 I, Matthew W. Grimshaw, do declare and state as follows:

3 1. I am the founder of Grimshaw Law Group, P.C., which maintains an office in Irvine,
4 California. I am over the age of 18 and not a party to this action.

5 2. I certify that on February 22, 2021, I caused a true and correct copy of the forgoing
6 AMENDED NOTICE OF MOTION TO AMEND PROOF OF CLAIM NO. 91790 FILED BY
7 ROBERT MICHAEL MONDAVI, OR, ALTERNATIVELY, FOR THE ALLOWANCE OF A
8 LATE-FILED CLAIM be served via e-mail on the Standard Party Email Service List attached hereto
9 as Exhibit A.

10 3. I certify that on February 22, 2021, I caused a true and correct copy of each of the
11 above-listed documents to be served via First Class Mail on the Standard Party First Class Mail
12 Service List attached hereto as Exhibit B.

13 4. I have reviewed the Notice of Electronic Filing for the above-listed documents and
14 understand that the parties listed in each NEF as having received notice through electronic mail were
15 electronically served with that document through the Court's Electronic Case Filing System.

16 5. I declare under penalty of perjury under the laws of the United States of America that
17 the foregoing is true and correct and that if called upon to witness, I could and would testify
18 competently thereto.

19 Executed on February 22, 2021, at Meridian, Idaho.

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21 MATTHEW W. GRIMSHAW
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EXHIBIT A
Standard Parties Email Service List
Served via Email

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel to Debtor	Weil, Gotshal & Manges LLP	Attn: Stephen Karotkin, Jessica Liou, Matthew Goren	stephen.karotkin@weil.com matthew.goren@weil.com jessica.liou@weil.com
Counsel to Debtor	Keller & Benvenutti LLP	Attn: Tobias S. Keller, Jane Kim	tkeller@kellerbenvenutti.com jkim@kellerbenvenutti.com
Special Counsel to Debtors	Cravath, Swaine & Moore LLP	Attn: Paul H. Zumbro, Kevin J. Orsinit, George E. Zobitz, Stephen M. Kessing, Nicholas A. Dorsey, Omid H. Nasab	pzumbro@cravath.com korsini@cravath.com jzobitz@cravath.com skessing@cravath.com ndorsey@cravath.com onasab@cravath.com
Counsel for JPMorgan Chase Bank, N.A., as DIP Administrative Agent	Stroock & Stroock & Lavan LLP	Attn: Kristopher M. Hansen, Erez E. Gilad, Matthew G. Garofalo, Frank A. Merola	khansen@stroock.com egilad@stroock.com mgarofalo@stroock.com fmerola@stroock.com
Counsel for the agent under the Debtors' proposed debtor in possession financing facilities, Counsel for Citibank N.A., as Administrative Agent for the Utility Revolving Credit Facility	Davis Polk & Wardwell LLP	Attn: Eli J. Vonnegut, David Schiff, Timothy Graulich	eli.vonnegut@davispolk.com david.schiff@davispolk.com timothy.graulich@davispolk.com
Counsel to California Public Utilities Commission	Paul, Weiss, Rifkind, Wharton & Garrison LLP	Attn: Alan W. Kornberg, Brian S. Hermann, Walter R. Rieman, Sean A. Mitchell, Neal P. Donnelly	akornberg@paulweiss.com bhermann@paulweiss.com wrieman@paulweiss.com smitchell@paulweiss.com ndonnelly@paulweiss.com
Office of the United States Trustee for Region 17	Office of the United States Trustee	Attn: James L. Snyder, Esq. & Timothy Lafreddi, Esq., Marta E. Villacorta	James.L.Snyder@usdoj.gov timothy.s.laffredi@usdoj.gov Marta.Villacorta@usdoj.gov
Interested Party United States on behalf of the Federal Energy Regulatory Commission	U.S. Department of Justice	Attn: Danielle A. Pham	danielle.pham@usdoj.gov

EXHIBIT A
Standard Parties Email Service List
Served via Email

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel for the Official Committee of Unsecured Creditors	Milbank LLP	Attn: Dennis F. Dunne, Samuel A. Khalil, Paul S. Aronzon, Gregory A. Bray, Thomas R. Kreller	ddunne@milbank.com skhalil@milbank.com Paronzon@milbank.com Gbray@milbank.com TKreller@milbank.com
Counsel for Official Committee of Tort Claimants	BAKER & HOSTETLER, LLP	Attn: Eric E. Sagerman, Lauren T. Attard, Robert A. Julian, Cecily A. Dumas	esagerman@bakerlaw.com lattard@bakerlaw.com rjulian@bakerlaw.com cdumas@bakerlaw.com
Counsel for Shareholder Proponents	JONES DAY	Attn: Bruce S. Bennett, Joshua M. Mester, James O. Johnston	bbennett@jonesday.com jmester@jonesday.com jjohnston@jonesday.com

EXHIBIT B

Standard Parties Hardcopy First Class Mail Service List
Served via First Class Mail

DESCRIPTION	NAME	NOTICE NAME	ADDRESS 1	ADDRESS 2	CITY	STATE	ZIP
Debtors	PG&E Corporation	Attn: President or General Counsel	77 Beale Street	P.O. Box 77000	San Francisco	CA	94177
Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission	Attn: General Counsel	U.S. NRC Region IV	1600 E. Lamar Blvd.	Arlington	TX	76011
Counsel for Shareholder Proponents	JONES DAY	Attn: Bruce S. Bennett, Joshua M. Mester, James O. Johnston	555 South Flower Street	Fiftieth Floor	Los Angeles	CA	90071-2300